

UNITED STATES FEDERAL COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE:

BISASOR, ET AL

Bankruptcy Appeal
Case No.: 1:15-cv-13813

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT
DISTRICT OF MASS.
APR 27 2016

EMERGENCY REQUEST FOR EXTENSION OF TIME TO FILE APPELLATE BRIEF


I, Andre Bisasor, hereby request a final 60 days of extension of time to file my appellate brief for the above-captioned case up to and including June 24, 2016. Grounds are as follows:

1. [NB: I am de facto operating pro se at this juncture and I am not a lawyer, so it is my understanding that all my statements and requests should be construed liberally and interpreted in a light most favorable. Also, as a result of my being untrained in the law, some of my statements may be inartfully stated or stated with imprecision.]
2. The parties have previously agreed to settlement in principle. I would like to update the Court that although a settlement agreement in principle was reached, the settlement documentation has not yet been finalized/signed off as yet. It is my understanding that the landlord's attorney has had some trouble in coordinating with the multiple parties involved on the landlord side (the property management company, Greystar; the actual landlord entity, RAR2 Jefferson at Dedham Station, and the Landlord entity's parent company, Deutsche Bank).
3. Also, because this involves a chapter 7 filing, the settlement process is now in the control of the trustee (the trustee recently got more involved in this process over the last few weeks); and the assent and approval by the trustee is a necessary factor in the finalizing/signing-off on the settlement.
4. If this settlement negotiation/agreement undertaken by the parties is finalized, it will dispose of the need for further litigation on this matter. This would redound to judicial economy and potentially save on the resources of the court and the parties.
5. I still anticipate that the matter will soon be settled finally. There are some final issues with the settlement that the parties and trustee have to finalize and it will likely be another few weeks before everything is done based on where things stand currently.
6. However, I am filing this extension just to protect my rights in the very small chance that something unexpected occurs that causes the settlement to somehow not go through, which I don't expect.
7. I apologize for not being able to have the settlement wrapped up sooner but it appears that I underestimated the challenges and complicating factors involved in doing so, particularly with the difficulties that the landlord has had in coordinating among the parties and the need for the involvement of the trustee. But my understanding is that we are 99% there in terms getting this wrapped up. The involvement of other parties including the trustee has just made this a little more complicated than I first imagined (i.e. as a pro se party unfamiliar with how things sometimes might play out).
8. This extension will allow for the settlement process to be concluded and finalized by the trustee.
9. Therefore, I am asking for a final 60 days of extension of time until 6/24/16.

10. Furthermore, given where things stand with the finalization of the settlement, if I were to file the appellate brief at this juncture, it could serve to disrupt the finalization of the settlement among the parties.
11. Therefore, I am asking for a final 60 days of extension of time until June 24, 2016. This should allow time to finalize the settlement including with any approvals by the trustee.
12. As a result of this and similar extenuating factors, more time is needed to resolve the matter, which remains the intent of the parties.
13. This will also allow for the settlement process to be fully finalized (which would make this appeal moot if settlement is in fact reached).
14. This is a modest/reasonable request under the circumstances.
15. I hesitate to ask again for another extension of time. However, if it pleases the court, this would be the last time such a request will be made on this matter.
16. Therefore, I am asking for a final 60 days of extension of time until 6/24/16.

WHEREFORE, I hereby humbly request this Honorable Court grant my request and/or other relief that the Court deems just and proper.

Respectfully submitted,
By The Debtor



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Dated: April 25, 2016